



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

September 19, 2005

Mr. Brad Mahaffy  
Federal Aviation Administration  
Washington Airports District Office  
23723 Air Freight Lane, Suite 210  
Dulles, VA 20166

Subject: Washington Dulles International Airport, Final Environmental Impact  
Statement/Section 4(f) Evaluation (DEIS). CEQ # 20050131

Dear Mr. Mahaffy:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and Section 404 of the Clean Water Act (CWA), the Environmental Protection Agency (EPA) offers the following comments regarding the New Runways, Terminal Facilities and Related Facilities at Washington Dulles International Airport, Final Environmental Impact Statement/Section 4(f) Evaluation (FEIS).

The Metropolitan Washington Airports Authority (MWAA) is proposing major new improvements to Dulles Airport (IAD) that are intended to enable the airport to safely and efficiently meet forecasted levels of aviation activity. MWAA's proposed project, which is the focus of the FEIS, includes adding two new parallel runways to the existing three runway configuration. The proposed project also includes associated taxiways, navigational aides, property acquisition, new concourse development, relocation of the National Weather Service Sterling, VA facilities and extension of the Automated People Mover (APM).

The most significant environmental impacts identified in the FEIS include the loss of over 1900 acres of undeveloped natural habitat located on the airport property which includes direct impacts to 175-180 acres of wetlands and over 60,000 linear feet of streams.

Since our comments on the DEIS, the Federal Aviation Administration (FAA) and MWAA contacted EPA to discuss their proposed response to our comments on the DEIS. The FEIS reflects these discussions and EPA has no further comment on purpose and need or alternatives.

In general the FEIS does an adequate job in assessing the affected environment and environmental consequences. However, regarding wetland and stream impacts, EPA continues to recommend that the final mitigation package be coordinated with EPA, the Fish and Wildlife Service and other appropriate state and local agencies prior to receiving a Section 404 of the Clean Water Act permit. Indeed, a joint state- federal wetland application has been filed with the Army Corps of Engineers (the Corps) and the Virginia Department of Environmental Quality (DEQ). The permit coordination process is on going at this time.

EPA remains concerned with the large wetland and stream impacts associated with this proposal and is concerned that due to the magnitude of stream impacts that stream compensation may not be achievable locally. According to the FEIS the preferred alternative will require 273 acres of wetland



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mitigation and will impact 60,858 linear feet of stream (compensation requirement yet to be determined). The FEIS is somewhat unclear on how these impacts will be mitigated. For example on page 6-10 the FEIS states that MWAA has purchased wetland and stream credits at mitigation banks. Does this mean that all the impacts have been mitigated in this manner or is this reference to the initial purchase of wetland credits performed by MWAA several years ago? This should be clarified. The FEIS does go on to provide more detail regarding wetland mitigation in Section 6.3.4. According to the FEIS MWAA holds the bill of sale for 200 of the required 273 acres of wetland mitigation, thus approximately 73 additional acres of wetland mitigation will be required. (It should be noted that there are more existing wetland mitigation banks potentially available to MWAA than are shown on Figure 6.4.1).

The mitigation requirements and method for stream impacts remains less resolved than for wetlands. As of yet, no stream compensation requirements have been articulated by DEQ or the Corps and apparently both Loudoun and Fairfax Counties want stream mitigation to occur within their jurisdictions. Although MWAA plans to put out an Request for Proposal (RFP) for stream impacts, this has yet to be done to EPA's knowledge.

However, notwithstanding our comments above, the FEIS acknowledges a commitment to mitigation and involvement of EPA in the mitigation process. EPA looks forward to working through the remaining wetland and stream compensation issues, including additional avoidance opportunities, during the joint permit process. We recommend a meeting with MWAA, the Corps, DEQ, EPA and FWS as soon as possible to address the remaining compensation issues.

EPA comments regarding air toxic modeling were not adequately addressed in the final EIS and we recommend that FAA and EPA meet to discuss the requirements of air modeling for this project. EPA looks forward to working through the air modeling issues to reach a consensus of the requirements for this project and future efforts.

If you have any questions or comments regarding this letter please feel free to contact me at 215-814-2995 or Mr. Peter Stokely of my staff at 703-648-4292.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Arguto', with a stylized flourish at the end.

William Arguto,  
NEPA Team Leader

cc: Norfolk District Corps of Engineers  
Fish and Wildlife Service